

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$13,218.00 IN U.S. CURRENCY,

Defendant,

and

DEANDRE ONEIL JACKMAN,

Claimant.

Case No. 21-mc-_____

**STIPULATION TO EXTEND
TIME TO COMMENCE
JUDICIAL FORFEITURE
PROCEEDINGS**

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until February 11, 2021.

1. On or about March 11, 2020, the Minneapolis/St. Paul International Airport Police (“APD”) and members of the United States Drug Enforcement Administration (“DEA”) seized \$13,218.00 in U.S. Currency from the Claimant.

2. The DEA commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On November 12, 2020, Deandre Oneil Jackman filed a claim for the Defendant Currency through his attorney, Craig E. Cascarano.

4. The time has expired for any other person to file a claim for the Defendant Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until April 12, 2021 in order to allow time for settlement discussions.

Dated: January 22, 2021

ERICA H. MacDONALD
United States Attorney

s/ Quinn Hochhalter
BY: QUINN HOCHHALTER
Assistant U.S. Attorney
Attorney ID No. 07791ND
600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55412
Phone: 612-664-5600
QHochhalter@usdoj.gov

Date: January 22, 2021

CASCARANO LAW OFFICE

s/ Quinn Hochhalter on behalf of Craig E. Cascarano
CRAIG E. CASCARANO, Esq.
Attorney ID No. 15544
150 South Fifth Street, Suite 2860
Minneapolis, MN 55402
612-333-6603
Attorney for Claimant
Deandre Oneil Jackman